

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

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WILLIAM E. UNDERLAND and MARK	:	
SCHALLER, on Behalf of Themselves and All	:	
Others Similarly Situated,	:	
	:	Electronically Filed
Plaintiffs,	:	
	:	
- against-	:	
	:	10-Civ.-3621 (CMR)
DENNIS ALTER , WILLIAM A. ROSOFF,	:	
PHILIP M. BROWNE, DAVID B.	:	
WEINSTOCK, MAX BOTEL, THOMAS	:	
COSTELLO, DANA BECKER DUNN,	:	
ROBERT LUBNER, OLAF OLAFSSON,	:	
MICHAEL STOLPER, and KPMG LLP,	:	
	:	
Defendants.	:	
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**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION, TO APPOINT
CLASS REPRESENTATIVES, AND TO APPOINT CLASS COUNSEL**

Pursuant to Fed. R. Civ. P. 23 ("Rule 23"), and Local Rule 23.1, Lead Plaintiffs William E. Underland and Mark Schaller ("Plaintiffs") respectfully move to certify a class of plaintiffs in this action defined as:

All individuals and entities who, between February 28, 2008, and November 8, 2009, purchased or otherwise acquired Advanta Corp. ("Advanta") RediReserve variable rate certificates and investment notes ("RediReserve Notes") issued pursuant to, or traceable to, the Company's Registration Statement/Prospectus filed on August 18, 2006, as amended on February 28, 2008, February 9, 2009, and March 12, 2009 (as amended, the "Registration Statement"), and who were injured thereby.¹

¹ Excluded from the Class are Defendants and members of their immediate families. The Defendants to the Action are: Dennis Alter, William A. Rosoff, Philip M. Browne, David B. Weinstock, Max Botel, Thomas Costello, Dana Becker Dunn, Robert Lubner, Olaf Olafsson, Michael Stolper (the "Advanta Defendants"), and KPMG LLP ("KPMG").

Plaintiffs also move the Court to appoint them as Class representatives and to appoint Scott+Scott, Attorneys at Law, LLP (“Scott+Scott”) and The Weiser Law Firm as Class Counsel. The basis for Plaintiffs’ motion is set forth in the accompanying Memorandum of Law, the Declaration of Thomas L. Laughlin IV and the exhibits thereto, and the Declaration of Mark Schaller. A proposed order granting the relief requested by Plaintiffs is attached as Exhibit E to the Declaration of Thomas L. Laughlin IV.

DATED: December 17, 2012

SCOTT+SCOTT LLP

/s/ Thomas L. Laughlin IV
THOMAS L. LAUGHLIN IV (admitted *pro hac vice*)
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Telephone: (212) 223-6444
Facsimile: (212) 223-6334

-and-

Geoffrey M. Johnson (admitted *pro hac vice*)
12434 Cedar Road, Suite 12
Cleveland Heights, OH 44106
Telephone: (216) 229-6088
Facsimile: (216) 229-6092

-and-

Anne L. Box (admitted *pro hac vice*)
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565
Facsimile: (619) 233-0508

THE WEISER LAW FIRM, P.C.
Robert B. Weiser (PA #81575)
Brett D. Stecker (PA #86242)
Christopher L. Nelson (PA #85609)
Jeffrey J. Ciarlanto (PA #205838)
22 Cassatt Ave.
Berwyn, PA 19312
Telephone: (610) 225-2677
Facsimile: (610) 408-8062

Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2012, the foregoing was filed electronically with the Court's Case Management/Electronic Case Files (CM/ECF) docketing system. Notice of this filing will be sent to all parties by operation of the CM/ECF system. Parties may access this filing through the CM/ECF system.

/s/ Thomas L. Laughlin IV
THOMAS L. LAUGHLIN IV (admitted *pro hac vice*)
SCOTT+SCOTT, Attorneys at Law, LLP
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Telephone: (212) 223-6444
Facsimile: (212) 223-6334

Counsel for Lead Plaintiffs